

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

LAUREN BALLARD,)	
)	
Plaintiff,)	Case No. 2:24-cv-1682-RMG-WSB
)	
vs.)	
)	
WESTON & SAMPSON ENGINEERS, INC.)	MOTION FOR EXTENTION OF
ET AL.)	TIME
Defendants)	
)	
)	

PLEASE TAKE NOTICE the Plaintiff, by and through undersigned counsel, moves the United States District Court for the District of South Carolina, Charleston Division, pursuant to Local Rule 6.01 and the Federal Rules of Civil Procedure for an Order permitting Plaintiff additional time to file her Supplemental Rule 26(a)(2) Disclosures required by the Court's order ECF 89.

Plaintiff has prepared the Supplemental Rule 26(a)(2) Disclosures and served a full copy of the same by email on Defendants June 2, 2025.

However, in reviewing the disclosures Plaintiff recognized the need to document medical information and the graphic anatomical details and descriptions of the SANE examination of the Plaintiff. Specifically, the information relates to health care provider, SANE nurse and witness Jacqueline Maillet. In an abundance of caution Plaintiff filed a Motion to file portions of Plaintiff's Supplemental Rule 26(a)(2) Witness Disclosures under Seal. ECF 91.

Attached to the filing at ECF 91-1 is a copy of the non-confidential portions of the witness

disclosure with redactions of a portion of Ms. Maillet's disclosures which Plaintiff seeks to seal. One medical record consisting of part of the SANE narrative description of events is also requested to be filed under seal.

Defendants have also been served by email with the **Redacted** Supplemental Rule 26(a)(2) Disclosures. Attached are the Non-Confidential Portion of Supplemental Rule 26(a)(2) Disclosures filed with the Motion to Seal and sent to the Defendants.

Plaintiff has at this time has provided Supplemental Rule 26(a)(2) Disclosures required by the Court's order ECF 89 as to Jacqueline Maillet, Ethan Ashley, MD and Dr. Michael Tran to Defendants. But Plaintiff has not filed them with the Court and seeks leave to delay and an extension of time to file the documents until the Plaintiff's Motion to Seal has been resolved.

As Plaintiff has provided the Defendants with Plaintiffs Supplemental Rule 26(a)(2) Disclosures in full and redacted forms Plaintiff does not believe that Defendants will be prejudiced by the delay should the Motion be granted..

Respectfully submitted,

s/ Jennifer Munter Stark

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June 2, 2025
Mt. Pleasant, SC